



The Home Town Network Inc
Lake Placid, Florida

October 29, 2007
Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: Comments in ET Docket No. 03-201

Dear Ms. Dortch:

The Home Town Network Inc. would like to submit these comments in regards to the Commission Further Notice of Proposed Rulemaking (FNPRM) on Rules for Part 15.¹ We are a Rural Internet Service Provider providing Internet service to Highlands County Florida.

In the FNPRM, the Commission seeks comment on whether a spectrum etiquette is needed in the 902-928 MHz band. Etiquettes being considered include one that would result in a significant reduction in power limits depending on a system's duty cycle.

Imposition of a spectrum etiquette will greatly harm the ability of The Home Town Network to provide broadband services. One of the benefits of the 902-928 MHz band for provision of broadband access is the greater range achieved as compared to higher frequency bands. This is especially important in rural areas. Imposition of duty cycle/power limitations would unacceptably limit the range of broadband wireless systems deployed today or that will be deployed in the future. Reducing the range of broadband wireless systems in this manner would significantly increase the cost of system deployment and make it difficult or impossible for companies to serve rural areas where cost of deployment is a critical factor.

Instead of imposing a spectrum etiquette, the Commission should maintain the existing general principles for operation in the unlicensed bands and allow industry

¹ Modification of Parts 2 and 15 of the Commission's Rules for unlicensed devices and equipment approval, *Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, ET Docket No. 03-201, FCC 07-117, (rel. June 22, 2007) ("FNPRM").

The Home Town Network, Inc. P.O. Box 1784 Lake Placid, FL 33862 (863) 465-4076

to continue to develop devices and systems which can operate successfully in the band.

Sincerely,

Steven M. Bastardi
President